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Mr. Gillan proposes to delete language at the bottom of 2nd Revised Sheet No. 3 of 1080 Q. 1081 Section 15 which makes it clear that the terms and conditions offered by the 1082 Company as set forth in that Section for "ordinarily combined" UNE-P as required 1083 by Section 13-801(d)(3) shall no longer be offered by the Company in the event that 1084 Section 13-801(d)(3) is repealed, expires, or otherwise no longer effective as enacted. 1085 Should Mr. Gillan's proposal to delete this language be adopted? 1086 No. To the extent that Section 15 includes a requirement that the Company combine A. unbundled network elements on behalf of a CLEC, such tariff provision is included as a 1087 1088 direct result of the enactment of Section 13-801(d)(3). As I have discussed in my Direct 1089 Testimony, this section imposes new obligations upon Ameritech Illinois beyond those 1090 obligations required under federal law. Accordingly, the terms and conditions related to 1091 new combinations should expire upon the repeal or expiration of Section 13-801(d)(3). 1092 Mr. Gillan also proposes to include on 2nd Revised Sheet No. 6, a statement that a 1093 Q. 1094 telecommunications carrier may request the Company to do all of the work 1095 necessary to provision and/or combine the same type of service that the Company 1096 and/or its affiliates "ordinarily combines" for its end users. Is this language appropriate? 1097 1098 No, I do not know what Mr. Gillan means by the phrase "do all the work necessary to Ä. 1099 provision and/or combine the same type of service." As I have previously discussed,

Section 13-801(d)(3) speaks in terms of combining unbundled network elements which

the Company ordinarily combines for itself. There is no requirement that the Company 1101 "combine services." Furthermore, as I have previously discussed, there is no requirement 1102 in Section 13-801 that Ameritech Illinois combine services or unbundled network 1103 1104 elements that an affiliate ordinarily combines for its users. 1105 Please comment on Mr. Gillan's proposed definition of "ordinarily combined" 1106 Q. 1107 (Gillan Tariff, Original Sheet 3.4). Mr. Gillan has equated the term "ordinarily" with the term "any," which is a contortion of 1108 Α. the plain meaning of those words, as well as a distortion of how these words are used in 1109 Section 13-801(d)(3). In my Direct Testimony, I discussed the plain meaning of 1110 "ordinary" and explained that ordinary means common. On the other hand, Webster's 1111 defines "any" as "one, some or all indiscriminately of whatever quantity." Ameritech 1112 Illinois' tariff language is appropriate and Mr. Gillan's interchanging of these words 1113 should be rejected. Mr. Gillan also inappropriately inserts the word "any" on Part 19, 1114 1115 Section 15, Original Sheet No. 1.1 of the Gillan Tariff in an attempt to expand Ameritech Illinois' obligation to "any combination of network elements provided by Ameritech 1116 1117 Illinois or its affiliates." 1118 1119 What does Mr. Gillan propose with regard to non-telecommunications services? Q. The Gillan Tariff (Part 19, Section 15, 2nd Revised Sheet No. 5) states that "Non-1120 A. Telecommunications Services are not included with UNE-P" (emphasis added). 1121 Ameritech Illinois agrees that is not appropriate to require the provision non-1122

telecommunications services (e.g., voice mail, inside wire maintenance) with UNE-P. ¹⁴ These non-telecommunications services are competitive services which end users can alternatively obtain from other, third-party providers.

A.

Q. Please comment on Mr. Gillan's proposal with regard to features and functions provided with UNE-P (Gillan Tariff, Part 19, Section 15, 2nd Revised Sheet No. 6).

Mr. Gillan seems to be attempting to blur the distinction between unbundled local switching (ULS) port features and other capabilities or services. Ameritech Illinois' ULS offering includes all vertical features resident in the switch. Tacitly, Mr. Gillan misconstrues Ameritech's obligation to provide ULS as an expanded obligation to provide additional services. The vagueness of Mr. Gillan's proposal should not be permitted to require the unbundling or provision of non-telecommunications services, non-UNEs or certain Advanced Intelligent Network ("AIN")-based service offerings. AIN-based services are not provided by the switch as part of unbundled local switching. As the FCC has already acknowledged, however, AIN service software developed by Ameritech is proprietary and is deployed on Ameritech's AIN platforms, not its switches. Consequently, Ameritech's Privacy Manager of SM software, for example, has never been classified as a local switching feature or function. Moreover, as a legal matter, the FCC has also specifically concluded that Ameritech has no obligation to

¹⁴ Ameritech Illinois reserves its right to later disagree with Mr. Gillan if he further revises his redlined tariff on this or any other subject matter.

¹⁵ See FCC <u>UNE Remand Order</u> (¶409), which expressly states that Privacy Manager is an AIN service software that qualifies as "proprietary" under Section 251(d)(2).

unbundle its Privacy ManagerSM software. 16 Further, when the FCC stated that Ameritech need not provision its AIN-based Privacy ManagerSM service as part of UNE-P, and when the FCC specifically excluded the Privacy ManagerSM software from any unbundling obligation, that was only one example of the type of AIN-based service that qualifies for "proprietary" treatment under Section 251(d)(2) of the Act and thus was not required to be unbundled. 17 The FCC specifically acknowledged that an ILEC may create AIN-based services that are unique or innovative in order to differentiate its These types of services are appropriately excluded from any product offerings. unbundling obligation, including as part of UNE-P. 18 As I have previously discussed (and as Mr. Gillan fails to acknowledge) Section 13-801(a) indicates that the ICC should construe and apply the requirements of Section 13-801 in a manner which is not inconsistent with the 1996 Act or the FCC's Rules implementing the 1996 Act. Thus, to the extent that Mr. Gillan is recommending that Ameritech must provide AIN-based services in general as part of its obligation to provide ULS, that claim is incorrect and must be rejected.

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Q. Please comment on Mr. Gillan's proposal that "UNE-P feature combinations" can be ordered either 'as-is' or 'as-specified' (Gillan Tariff, Part 19, Section 15, 2nd Revised Sheet No. 6).

¹⁶ See UNE Remand Order, ¶¶419, 420.

¹⁷ See UNE Remand Order, ¶402.

As a separate matter, Ameritech complies with the FCC's rules regarding CLEC access to AIN databases on a nondiscriminatory basis. CLECs have access to the underlying functionality, including Ameritech's AIN Service Creation Environment (SCE), in order to create their own AIN-based offerings, as the FCC requires, as part of encouraging and providing incentives to CLECs to create their own AIN-based services.

1161	A.	As an initial matter, it is unclear what is meant by a "UNE-P feature combination"; in
1162		fact there is no such thing. When Ameritech Illinois provides the ULS UNE (e.g., as part
1163		of UNE-P), the CLEC obtains access to all of the vertical features resident in the switch
1164		and it is the CLEC's choice and responsibility to designate which features it wants to
1165		activate on the end user's line. Mr. Gillan seems to be confusing resale with UNE-P,
1166		because with resale a CLEC may purchase, at a wholesale discount, the same features or
1167		"feature packages" that Ameritech provides its retail end users. However, with ULS (and
1168		UNE-P) there is no such thing as a "feature package" as the CLEC has access to all of the
1169		features in the switch.
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1171 Q. Please comment on Mr. Gillan's deletion of the monthly, recurring cross-connection 1172 charge (Gillan Tariff, Part 19, Section 15, 2nd Revised Sheet No. 8).

Without explanation or basis, Mr. Gillan has deleted the cross-connection charge, which is a Commission approved rate element. Ameritech Illinois' proposed tariff clarifies that one (1) cross-connection charge applies to a UNE-P combination. Ameritech Illinois' proposed language is appropriate, because there is in fact one cross connect used to connect the loop and port elements of the UNE-P.

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Q.

Mr. Gillan (p. 13) proposes to eliminate the word "unnecessary" from the Company's proposed tariff language stating that when ordered, pre-existing UNE-P will be provided "without any unnecessary disruption to the end users services." Do you have any comments on Mr. Gillan's proposal?

1183 A. Yes. Mr. Gillan's proposal, which he implements with language changes on 2nd Revised

1184 Sheet Nos. 7 and 8 of Section 15 of the Gillan Tariff, should be rejected. In support of

1185 his proposal, Mr. Gillan asserts that it is "Ameritech's responsibility to design systems

1186 that migrate customers without disruption, not rewrite the PUA to its own (lower)

1187 standards." As I discussed this in my Direct Testimony (at pp.26-31), the inclusion of the

1188 word "unnecessary" in the proposed tariff implements a realistic and reasonable standard.

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Q.

- Please comment on Mr. Gillan's proposed language regarding Rate Application,
 Non-Recurring charges (Gillan Tariff, Part 19, Section 15, 2nd Revised Sheet No. 9,
 and 2nd Revised Sheet No. 10).
- Mr. Gillan's proposed rate application is wrong. First, Mr. Gillan incorrectly assumes 1193 A. that Ameritech Illinois' costs are the same to provision existing UNE-P and new UNE-P. 1194 As discussed in my Direct Testimony, and as I discussed earlier, there is significantly 1195 more work involved with provisioning a new UNE combination than with the 1196 "migration" of a customer's working service. It is appropriate that Ameritech Illinois 1197 recover its costs when it performs the work to provision UNEs and then combines them 1198 for the CLEC as under the new UNE-P tariff. Second, Mr. Gillan ignores the distinctions 1199 between "basic" and "complex" UNEs, which involve more work. Staff recognizes that 1200 1201 such distinctions are actual and are appropriate to reflect in the application of nonrecurring charges (although, as I discussed earlier, I disagree with Staff's proposal that 1202 1203 the Company not be allowed to assess non-recurring line and port connection charges on Third, Mr. Gillan incorrectly assumes that loop a new UNE-P combination). 1204 conditioning is the only type of CLEC request that could cause Ameritech Illinois to 1205

perform work. This is not true, given the wide range of loop and switch port functionality that a CLEC may request. Mr. Gillan also proposes language regarding "splitter functionality," which is addressed in the direct testimony of Mr. Welch.

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Q. Please comment on Mr. Gillan's recommendation to delete, in its entirety,

Ameritech's proposed tariff, Ill. C.C. No. 20, Part 19, Section 19.

Ameritech Illinois' proposed tariff language contained in Part 19. Section 19 reflects its obligation to permit CLECs to reconfigure qualifying special access services to UNE loop-transport combinations. pursuant to the FCC's Supplemental Order Clarification. Further, the Draft I2A contained references to the FCC's Supplemental Order Clarification. There is absolutely no basis, and Mr. Gillan provides none, to modify or delete this language. Mr. Gillan is attempting to obliterate the distinction between an existing special access service and a new EEL. Obviously, a special access circuit cannot qualify for conversion to a UNE loop-port combination unless it already exists (and, of course meets the other FCC's other criteria). The tariff section Mr. Gillan deletes contains the Company's proposed language which implements the FCC-defined conversion process. However, leaving this language in Ameritech Illinois' tariff would apparently require Mr. Gillan to acknowledge that there are differences between what exists and what must be provisioned as new (e.g., new EELs). Rather than deal with this factual distinction, Mr. Gillan proposes to delete this entire tariff section so that he can justify his other tariff proposals.

- Q. Please comment on Mr. Gillan's proposed EEL tariff with regard to language changes on 3rd Revised Sheet No. 1 (Part 19, Section 20).
- On 3rd Revised Sheet No. 1, Mr. Gillan again deletes language that would differentiate an 1230 A. 1231 existing combination from a new combination. Further, Mr. Gillan inserts language that 1232 states the four types of EELs provided in the Draft I2A "are standardized examples" of 1233 the types of UNE loop-transport combinations provided by Ameritech Illinois to its retail 1234 customers. Mr. Gillan's language is misleading because it implies that retail customers 1235 typically request from Ameritech Illinois "standardized" UNE loop-transport 1236 combinations, including high capacity transport such as DS-3 (a DS-3 provides 672 1237 voicegrade equivalent circuits). Further, the EELs listed in Ameritech Illinois' proposed 1238 compliance tariff are listed for the explicit reason that those combinations are referred to 1239 by the PUA. Thus, Mr. Gillan's language is misleading and unnecessary. In addition, 1240 Mr. Gillan attempts to expand the types of EELs that can be requested subject to a "BFRlike" process which he calls the "RAC" process. This is discussed in Mr. Silver's 1241 1242 rebuttal testimony.

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- Q. Please comment on the proposed language changes on 2nd Revised Sheet No. 2 of the Gillan Tariff (Part 19, Section 20).
- A. Although Mr. Gillan agrees with that portion of Ameritech Illinois' language that defines the EEL as a combination of UNE loop and UNE dedicated transport, Mr. Gillan suggests changing the portion of the EEL description that defines the EEL as having the transport side terminating in the CLEC's collocation, as specified in the Draft I2A. As stated in my Direct Testimony, Ameritech Illinois' proposed tariff directly responds to the PUA to

1251		reflect the Draft I2A's combinations. To the extent that a CLEC requests an EEL
1252		pursuant to the proposed tariff language, the CLEC could order an entrance facility from
1253		its collocation to its own switch location.
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1255	īV.	RESPONSE TO NOVACON
1256 1257	Q.	Novacon's witness Mr. Walker claims that the PUA provides an "open" list of UNE
258		combinations that Ameritech Illinois can be required to combine. How do you
259		respond?
260	A.	Mr. Walker's characterization of Section 13-801(d)(3) as an "open list" is misleading.
261		The PUA does not state that Ameritech Illinois must combine any and all network
262		elements for CLECs as an "open" list. Ameritech Illinois recognizes the PUA's language
263		that the UNE combinations are "including, but not limited to" those contained in the
264		Draft I2A, and the Company has complied with this aspect of the PUA by providing
265		additional types of UNE-P combinations that were not contained in the Draft I2A and by
266		including a BFR process so that CLECs may request other combinations they believe are
267		"ordinarily combined."
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269	Q.	Mr. Walker discusses what he describes as "problems" that Novacon allegedly has
270		had in ordering UNEs and UNE combinations from Ameritech (Walker, pp. 5-6).
271		Do you have any comments in response to Mr. Walker's testimony in this regard?
272	Α.	Yes, I do. I have reviewed correspondence between Novacon and Ameritech related to
273		the requests described in Mr. Walker's testimony. It appears that the only "problem" is
274		Novacon's reluctance to comply with the procedure provided for under the terms of its

effective interconnection agreement with the Company. In correspondence dated June 1,
2001, the Company expressly informed Novacon that Novacon's request to convert these
circuits is governed by the terms of the parties' interconnection agreement. The
correspondence went on to inform Novacon that the combinations of UNE's requested by
Novacon, i.e., those "private lines" that Novacon wanted "converted," were not among
the list of readily available combinations in the interconnection agreement. Accordingly,
the Company informed Novacon that, pursuant to Section 9.3.6 of the agreement,
Novacon would have to use the BFR process specified in Section 9.6 to make its request.
Novacon has never taken the opportunity to avail itself of this opportunity.
Mr. Walker claims that the BFR requirement is a "lengthy and costly" process
which "only serves to delay and add unwarranted costs to Novacon's provision of
service to its customers." Do you have any comments in response to Mr. Walker's
assertion in this regard?

Yes. Regardless of what Mr. Walker may think about the BFR requirement, it is

nonetheless a requirement of Novacon's effective interconnection agreement with

Ameritech Illinois, a fact that Mr. Walker does not appear to dispute. Furthermore, the

BFR requirement is necessary and reasonable for the reasons discussed by Mr. Silver. In

addition, the BFR process is necessary and appropriate for CLECs to make requests for

offerings that are not expressly contained in the agreement.

Q.

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1296	Q.	Mr. Walker asserts that, in later discussions, Ameritech "changed its position and
1297		decided that it would not provide Novacon with the requested service under any
1298		circumstances". Is that correct?
1299	A.	No. After the Company sent the correspondence discussed above, Novacon made some
1300		requests for the conversion of specifically identified "private line" circuits. In its review
1301		of those specific requests, it became clear that a segment of each of the requested circuits
1302		were "transport facilities" from a Novacon location to an Ameritech central office and
1303		that these that are not identified as UNEs in the agreement and that the FCC has not
1304		required the Company to provide as UNEs under the "necessary" and "impair" standard.
1305		It is with respect to those specific requests that the Company indicated that the BFR
1306		process would not result in the provision of the requested combination.
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1308	Q.	Please comment on Mr. Walker's claim that "Ameritech has sought to limit the
1309		types of services it will offer", and that "the proposed tariff restricts which CLEC
1310		customers can receive service" (Walker, p. 4-5).
1311	A.	The tariff language Mr. Walker appears to be objecting to is directly from the Draft I2A
1312		description of EELs. The PUA states that Ameritech Illinois is to provide the
1313		combinations in the Draft I2A, so the language in Ameritech Illinois' tariff is appropriate.
1314		Further, Ameritech Illinois' proposed tariff, like its wholesale tariff in general, provides
1315		UNEs for a CLEC to provide telecommunications services to the CLEC's end user

customers. Thus, it is not appropriate to modify Ameritech Illinois' proposed tariff to

"acknowledge" that a CLEC may use Ameritech Illinois' UNEs to "sell" to other

telecommunications carriers. A CLEC that purchases a UNE is entitled to use that UNE

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1319		to provide a telecommunications service to the public. A requesting carrier's "reselling"
1320		of UNEs to other carriers. as suggested by Mr. Walker, is not consistent with the 1996
1321		Act. In addition, Section 13-801 does not require Ameritech Illinois to provide CLECs
1322		with access to UNEs for the purpose of reselling those UNEs. Further, as I explained in
1323		my Direct Testimony, Section 801(j) states that Section 13-801 is not intended to require
1324		Ameritech Illinois to substitute a combination of UNEs for "special access services." 19
1325	Q.	Please comment on Mr. Walker's claim that there is not a "proper tariff covering
1326		local dedicated services" (Walker, p. 7).
327	Α.	Mr. Walker is wrong. CLECs may obtain, at a wholesale discount, dedicated
328		transmission services from Ameritech Illinois pursuant to tariff (e.g., Ill. C.C. No. 20,
1329		Part 22, Section 35). Further, it appears that Mr. Walker is referring to special access or
330		private line services when he refers to "local dedicated services." As I stated above,
.331		Section 13-801 (j) states that Section 13-801 does not require the substitution of UNEs
332		for special access services. As discussed in my Direct Testimony, special access service
.333		and private line service are functionally identical, as recognized in Section 790.10 of the
334		Commission's interconnection rules, 83 Ill. Admin. Code Section 790.10, which includes
335		the following definition:
336 337 338 339		Special access or private line means a transmission path that connects customer- designated premises directly through a local exchange carrier's hub or hubs where bridging or multiplexing functions are performed, or to connect a customer- designated premises and a serving office, and includes all exchange access not
340 341		utilizing the local exchange carrier's end office switches.

¹⁹ The ICC's rules define special access and "private lines" synonymously. The "DS-1 point-to-point" circuits which Mr. Walker alleges Novacon has requested Ameritech Illinois to convert to "UNE Platforms" appears to fall into such a category (i.e., private line).

This was recently affirmed by the HEPO in Docket No. 99-0511. Thus, Section 13-801(j) did not change the law as it existed prior to the enactment of H.B. 2900 with respect to the substitution of UNE combinations for special access or private line service. As I previously discussed, therefore, Novacon's rights to convert an existing private line to a UNE combination is governed by the terms of its interconnection agreement.

Q.

Mr. Walker alleges that Ameritech Illinois has "refused to provide new UNE combinations to Novacon" so that Novacon could use "a clear channel point-to-point DS-1 circuit to carry combined local customer traffic between points within the LATA." How do you respond?

It is unclear what Mr. Walker is alleging. Ameritech's tariff already makes available unbundled dedicated transport at the DS-1 level that Novacon can use to carry its customers' traffic within the LATA. Ameritech's proposed EEL tariff also enables Novacon to obtain certain new UNE combinations which include DS-1 loop and transport combinations. Mr. Walker does not attempt to explain why these offerings cannot be used by Novacon to provide service to its end users. Mr. Walker also does not explain why Ameritech Illinois should be required to provide additional, new UNE combinations that are not already listed in its proposed compliance tariffs, or Novacon's interconnection agreement, or which Novacon could have requested, but chose not to request, under the BFR process available to it under the interconnection agreement.

Q. Please comment on Mr. Walker's claim that Ameritech Illinois' proposed tariff "attempts to circumvent House Bill 2900" (Walker, p. 8).

Mr. Walker is incorrect. Ameritech Illinois' tariff contains the new combination offerings that the PUA stated Ameritech Illinois must provide (i.e., the Draft I2A combinations). It is not appropriate for Mr. Walker to effectively strike language from the proposed tariffs that was part of the Draft I2A combinations. Further, as I discussed above, Ameritech Illinois' proposed tariffs are consistent with Section 13-801(j) and ICC Rule 790.10.

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Α.

Q. Mr. Walker, on page 8 of his direct testimony, claims that Ameritech Illinois has "tailored its definition of ordinarily combined to distinguish between voice and data services." How do you respond?

This is not true. For the reasons discussed in my Direct Testimony, the proposed tariff complies with the PUA. Mr. Walker is inappropriately attempting to expand the requirements of the PUA. Moreover, the terms "ordinarily combined" are only applicable to the issue of what UNEs Ameritech Illinois is required to combine on behalf of a CLEC. A CLEC, such as Novacon, may purchase UNEs for the purpose of providing voice or data traffic to end-users. Further, a CLEC may combine those UNEs for itself. In addition, as previously discussed, Novacon may request UNE combinations in accordance with the terms of its interconnection agreement. Ameritech Illinois is not, however, required by Section 13-801 to do the work of combining UNEs on behalf of a CLEC, that the Company does not "ordinarily combine" for itself, as that term is applied for purposes of Section 13-801.

1387	Q.	Mr. Walker infers that because Ameritech Illinois provides "data circuits" under its
1388		retail tariff that "data circuits" must be provided as "ordinarily combined" UNE
1389		combinations under Section 13-801. How do you respond?

Although Mr. Walker takes exception with Ameritech Illinois' interpretation of what constitutes "ordinarily combined." he provides no useful definition of his own, other than to argue that the PUA gives CLECs an "open list." Certainly, some weight must be given to the term "ordinarily" as used in the statute, because if the legislature had intended to provide an "open list", it could have written the statute to exclude the term "ordinarily." Mr. Walker's view would give that term no weight and would essentially write it out of the law. Further, Mr. Walker ignores the language in Section 13-801(j) and how that language impacts the scope of this proceeding, as it relates to special access or private line services.

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Α.

Q. Please explain further.

Section 13-801(d)(3) states that, upon request, Ameritech Illinois "shall combine any sequence of UNEs that it ordinarily combines for itself, including but not limited to, unbundled network elements identified in The Draft of the Proposed Ameritech Illinois 271 Amendment (I2A) [the "Draft I2A"] found in Schedule SJA-4 attached to Exhibit 3.1." Under Mr. Walker's view, the term "any" would remain in the statute and the term "ordinarily" would be eliminated. Although I am not an attorney, my view is that these terms must be accorded their plain meaning and be taken in the context of 13-801, including Section 13-801(j).

1410	Q.	Is Novacon merely seeking a steeper discount on the point-to-point services it can
1411		already obtain under Ameritech Illinois' resale offerings?
1412	A.	Mr. Walker admits as much, on page 13 of his testimony, when he states that "Novacor
1413		is not replacingspecial access with UNEsit is replacing resale point-to-point services
1414		with UNEs."
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1416	Q.	In your opinion, would Novacon obtain any different functionality, features, or
1417		capability if it replaced resale point-to-point services with UNEs?
1418	A.	No.
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1420	Q.	At pp. 13-15 of his testimony, Mr. Walker asserts that the policy underlying the
1421		FCC's treatment of special access does not apply to private line service. Do you
1422		have any comments in response to Mr. Walker's assertions?
1423	A.	As I discussed earlier, "private line" and special access are synonymous under the ICC's
1424		definitions and are functionally identical. Thus, contrary to Mr. Walker's assertion, it is
1425		reasonable, from a policy perspective, to apply the FCC's treatment of special access to
1426		interexchange "private line" service with respect to any substitution of those services
1427		with UNEs.
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1429	Q.	Would facilities-based CLECs providing point-to-point, dedicated transmission
1430		services benefit from Mr. Walker's proposal?
1431	A.	No, this point is addressed further in Dr. Aron's rebuttal testimony.
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Q. Mr. Walker (p. 14) argues that if "point-to-point" direct access is characterized as special access, Ameritech will not be required to provide CLECs with the "local services they need to compete." Mr. Walker further argues that this "impairs" Novacon's "ability to compete." How do you respond?

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Once again, Novacon has confused the issue of what new UNE combinations Ameritech Illinois must provide to CLECs under Section 13-801(d)(3) with the issue of what UNEs or existing combinations of UNEs the CLEC may have access to. For the reasons fully discussed in my Direct Testimony, it is Ameritech Illinois' position that the Company is not required by Section 13-801 to perform the work of providing new combinations of UNEs used to provide "point-to-point" data circuits (although Novacon has the right to request such new combinations in accordance with the terms of its ICA). As I previously discussed, Novacon is free to order UNEs needed to create point-to-point data circuits and combine those UNEs for itself or to convert an existing "private line" circuit to an existing combination of UNEs in accordance with the terms of its ICA (provided, of course, that the facilities that make up the circuit qualify as UNEs). Moreover, Novacon has several other options to serve its end users. First, Novacon may provide its own facilities. Second. Novacon may purchase resale services and obtain such circuits at the wholesale discount. Novacon may also configure its network to take advantage of Ameritech Illinois' collocation offerings and combine Ameritech Illinois' UNEs itself, or request/negotiate other combining arrangements through an interconnection agreement. In sum, there is absolutely no basis for Novacon's assertion that Ameritech Illinois is using its "local monopoly bottleneck control to deny Novacon access to UNEs in a manner that impairs its ability to compete". Mr. Walker appears to be simply arguing for

a larger resale discount on the "point-to-point" services Novacon obtains from Ameritech Illinois pursuant to Ameritech's resale obligations. In any event, a CLEC's alleged "need" for lower prices is not adequate to meet the FCC's "impair" criteria, and Mr. Walker provides no other support for his claim.

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Q. Mr. Walker argues that Ameritech Illinois' tariff "should reflect the possibility of resale of third party facilities." How do you respond?

It is not totally clear what Mr. Walker means by "third party facilities." However, it appears that he is arguing that a CLEC should be generally permitted to resell Ameritech Illinois' UNEs to other parties, rather than the CLEC using the UNE to directly provide a telecommunications service to its customer. The FCC's rules implementing the 1996 Act are clear that an ILEC must provide access to a UNE "in a manner that allows the requesting telecommunications carrier to provide any telecommunications service that can be offered by means of that network element" (47 CFR 51.307(c)). For example, when Ameritech Illinois provides a UNE, say an unbundled loop, to a CLEC, the CLEC may combine that UNE with its own switching to provide a telecommunications service (e.g., local exchange service). However, if the CLEC instead chooses to resell that UNE to another carrier, it is obvious that the CLEC (i.e., the "requesting carrier") is not providing a telecommunications service using "that network element." Similarly, when Ameritech Illinois provides a UNE to a CLEC. Ameritech Illinois is not providing a telecommunications service to the CLEC, as it is the CLEC which must use the UNE to provide a telecommunications service using "that network element."

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1479	Q.	Please comment on Mr. Walker's proposed tariff change for Part 19, Section 20
1480		regarding EELs.
1481	A.	Mr. Walker proposes to strike language in the tariff that was directly from the Draft I2A
1482		EEL product definition. This is not appropriate, as Mr. Walker would be circumventing
1483		both the PUA's statement that Ameritech Illinois is to provide the Draft I2A
1484		combinations as well as the language in Section 13-801(j).
1485		
1486	Q.	Mr. Walker suggests that Ameritech Illinois' EEL tariff include dark fiber loop-
1487		transport combinations. How do you respond?
1488	A.	Mr. Walker provides absolutely no basis for Dark Fiber to be included as a type of EEL
1489		combination, or that this would be considered "ordinarily combined" under Section 13-
1490		801. Mr. Walker's proposal should be rejected.
1491	A.	
1492		
1493	Q.	Does this conclude your Rebuttal Testimony?
1494	A.	Yes.
1495		
1496		
1497		
1498		

The three ordinarily (new) combined UNE-P offerings listed on Sheet No. 2 of the Proposed Tariff Ill. C.C. No. 20, Part 19, Section 15 (Advice No. 7555) along with associated Nonrecurring and Recurring charges are as follows:

These ordinarily (new) combined unbundled network element - platform ("UNE-P") offerings are comprised of an unbundled loop and unbundled local switching with shared transport ("ULS-ST"), combined by the Company.

1. 2-WireBasic Analog Loop with Basic Line Port

The rate elements related to the unbundled network elements that comprise the ordinarily (new) combined 2-wire basic UNE-P, including citations to the currently effective tariffs, are the following:

- a. Loop Service Order Charge, \$8.86 (see Note 1) NRC per order (Ill. C.C. No. 20, Part 19, Section 2, 2nd Rev. Sheet No. 33):
- Line Connection Charge \$25.08 (see Note 2) NRC per Loop (III. C.C. No. 20, Part 19, Section 2, 2nd Rev. Sheet No. 33);
- c. 2-Wire Basic Loop: Loop Area A, \$2.59 MRC; Loop Area B, \$7.07 MRC; Loop Area C, \$11.40 MRC (III. C.C. No. 20, Part 19, Section 2, 2nd Rev. Sheet No. 31);
- d. ULS-ST Basic Port Service Order Charge, \$2.93 (see Note 3) NRC per occasion (Ill. C.C. No. 20, Part 19, Section 3, 1st Revised Sheet No. 41);
- e. Basic Line Port Charge, \$53.01 NRC (Ill. C.C. No. 20, Part 19, Section 3, 3rd Rev. Sheet No. 40);
- f. ULS-ST Basic Line Port: \$5.01 MRC; (Ill. C.C. No. 20, Part 19, Section 3, 3rd Rev. Sheet No. 40);
- Daily Usage Feed, \$0.000918 per message (Ill. C.C. No. 20, Part 19, Section 3, Orig. Sheet No. 42);
- h. ULS-ST Service Coordination Fee, \$1.15 MRC per bill per switch (Ill. C.C. No. 20, Part 19, Section 3, Orig. Sheet No. 42);
- i. ULS Billing Establishment Charge (if applicable, \$138.12 per carrier, per switch (Ill. C.C. No. 20, Part 19, Section 3, Orig. Sheet No. 42);
- j. ULS Originating Usage, \$0.000000 per MOU (Ill. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- ULS Terminating Usage, \$0.000000 per MOU (Ill. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- 1. ULS-ST Blended Transport Usage, \$0.001262 per MOU (Ill. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- m. ULS-ST Common Transport Usage, \$0.000809 per MOU (III. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- n. ULS-ST Tandem Switching Usage, \$0.000215 per MOU (III. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- ULS-ST Reciprocal Compensation, \$0.001100 per MOU (Ill. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- p. ULS-ST SS7 Signaling Transport, \$0.000176 per message (Ill. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- q. Ameritech Cross-Connection Service, \$0.14 MRC per cross-connect (III. C.C. No. 20, Part 23, Section 4, 1st Rev. Sheet No. 46);
- r. Loop Service Coordination Fee, \$1.15 MRC per bill per central office (Ill. C.C. No. 20, Part 19, Section 2, 2nd Revised Sheet No. 33).

- 1. Reduced to \$2.58 pursuant to October 16, 2001 Docket 98-0396 Order
- 2. Reduced to \$20.21 pursuant to October 16, 2001 Docket 98-0396 Order
- 3. Reduced to \$2.35 pursuant to October 16, 2001 Docket 98-0396 Order

2. 2-Wire 160 Kpbs (ISDN-BRI) Digital Loop with ISDN Direct Line Port

The rate elements related to the unbundled network elements that comprise the ordinarily (new) combined 2-wire 160 Kpbs (ISDN-BRI) UNE-P, including citations to the currently effective tariffs, are the following:

- a. Loop Service Order Charge, \$8.86 (see Note 1) NRC per order (III. C.C. No. 20, Part 19, Section 2, 2nd Rev. Sheet No. 33);
- b. Line Connection Charge \$25.08 (see Note 2) NRC per Loop (Ill. C.C. No. 20, Part 19, Section 2, 2nd Rev. Sheet No. 33);
- c. 2-Wire 160 kbps (ISDN-BRI) Interface Loop: Loop Area A, \$2.71 MRC; Loop Area B, \$8.88 MRC; Loop Area C, \$13.68 MRC (III. C.C. No. 20, Part 19, Section 2, 2nd Rev. Sheet No. 31);
- d. ULS-ST Complex Port Service Order Charge, \$410.63 (see Note 3) NRC per occasion (Ill. C.C. No. 20, Part 19, Section 3, 1st Revised Sheet No. 41);
- e. ISDN-Direct Port, \$53.01 NRC per port (III. C.C. No. 20, Part 19, Section 3, 3rd Rev. Sheet No. 40);
- f. ULS-ST ISDN-Direct Port: \$28.42 MRC plus \$0.01 per telephone number MRC; (III. C.C. No. 20, Part 19, Section 3, 3rd Rev. Sheet No. 40);
- g. Daily Usage Feed, \$0.000918 per message (Ill. C.C. No. 20, Part 19, Section 3, Orig. Sheet No. 42);
- h. ULS-ST Service Coordination Fee, \$1.15 MRC per bill per switch (Ill. C.C. No. 20, Part 19, Section 3, Orig. Sheet No. 42);
- i. ULS Billing Establishment Charge (if applicable, \$138.12 per carrier, per switch (Ill. C.C. No. 20, Part 19, Section 3, Orig. Sheet No. 42);
- j. ULS Originating Usage, \$0.000000 per MOU (III. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- k. ULS Terminating Usage, \$0.000000 per MOU (Ill. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- ULS-ST Blended Transport Usage, \$0.001262 per MOU (III. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- m. ULS-ST Common Transport Usage, \$0.000809 per MOU (III. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- n. ULS-ST Tandem Switching Usage, \$0.000215 per MOU (Ill. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- o. ULS-ST Reciprocal Compensation, \$0.001100 per MOU (III. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- p. ULS-ST SS7 Signaling Transport, \$0.000176 per message (Ill. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- q. Ameritech Cross-Connection Service, \$0.14 MRC per cross-connect (III. C.C. No. 20, Part 23, Section 4, 1st Rev. Sheet No. 46);
- r. Loop Service Coordination Fee, \$1.15 MRC per bill per central office (Ill. C.C. No. 20, Part 19, Section 2, 2nd Revised Sheet No. 33).

- 1. Reduced to \$2.58 pursuant to October 16, 2001 Docket 98-0396 Order
- 2. Reduced to \$20.21 pursuant to October 16, 2001 Docket 98-0396 Order
- 3. Reduced to \$27.60 pursuant to October 16, 2001 Docket 98-0396 Order

3. 4-Wire Digital Loop with Digital Trunk Port

The rate elements related to the unbundled network elements that comprise the ordinarily (new) combined 4-wire digital UNE-P, including citations to the currently effective tariffs, are the following:

- a. Loop Service Order Charge, \$8.86 (see Note 1) NRC per order (Ill. C.C. No. 20, Part 19, Section 2, 2nd Rev. Sheet No. 33);
- b. Line Connection Charge \$25.08 (see Note 1) NRC per Loop (Ill. C.C. No. 20, Part 19, Section 2, 2nd Rev. Sheet No. 33);
- c. 4-Wire 1.544 Mbps Interface Loop: Loop Area A, \$73.46 MRC; Loop Area B, \$61.45 MRC; Loop Area C, \$61.56 MRC (III. C.C. No. 20, Part 19, Section 2, 2nd Rev. Sheet No. 31);
- d. ULS-ST Complex Port Service Order Charge, \$410.63 (see Note 2) NRC per occasion (III. C.C. No. 20, Part 19, Section 3, 1st Revised Sheet No. 41);
- e. Digital Trunking Trunk Port, \$778.06 NRC, per port (III. C.C. No. 20, Part 19, Section 3, 3rd Rev. Sheet No. 40);
- f. ULS-ST Digital Trunking Port: \$102.08 MRC; (Ill. C.C. No. 20, Part 19, Section 3, 3rd Rev. Sheet No. 40);
- g. Daily Usage Feed, \$0.000918 per message (Ill. C.C. No. 20, Part 19, Section 3, Orig. Sheet No. 42);
- h. ULS-ST Service Coordination Fee, \$1.15 MRC per bill per switch (Ill. C.C. No. 20, Part 19, Section 3, Orig. Sheet No. 42);
- i. ULS Billing Establishment Charge (if applicable, \$138.12 per carrier, per switch (Ill. C.C. No. 20, Part 19, Section 3, Orig. Sheet No. 42);
- j. ULS Originating Usage, \$0.000000 per MOU (Ill. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- ULS Terminating Usage, \$0.000000 per MOU (Ill. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- 1. ULS-ST Blended Transport Usage, \$0.001262 per MOU (Ill. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- m. ULS-ST Common Transport Usage, \$0.000809 per MOU (Ill. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- n. ULS-ST Tandem Switching Usage, \$0.000215 per MOU (Ill. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- o. ULS-ST Reciprocal Compensation, \$0.001100 per MOU (Ill. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- p. ULS-ST SS7 Signaling Transport, \$0.000176 per message (Ill. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- q. Ameritech Cross-Connection Service, \$0.31 MRC per cross-connect (III. C.C. No. 20, Part 23, Section 4, 1st Rev. Sheet No. 46);
- r. Loop Service Coordination Fee, \$1.15 MRC per bill per central office (Ill. C.C. No. 20, Part 19, Section 2, 2nd Revised Sheet No. 33).

Notes:

 Replaced with following rate structure and rates pursuant to October 16, 2001 Docket 98-0396 Order

	200.
Administrative Charge	\$142.93
Design & C. O. Line Connection Charge	\$332.61
Customer Connection Charge	\$185.48

2. Reduced to \$27.60 pursuant to October 16, 2001 Docket 98-0396 Order

In addition to the three ordinarily (new) combined UNE-P offerings listed on Sheet No. 2 of the Proposed Tariff Ill. C.C. No. 20, Part 19, Section 15 (Advice No. 7555), Ameritech Illinois will also be offering nine (9) additional ordinarily (new) combined UNE-Ps. The associated Nonrecurring and Recurring charges for these additional offerings are as follows:

These ordinarily (new) combined unbundled network element - platform ("UNE-P") offerings are comprised of an unbundled loop and unbundled local switching with shared transport ("ULS-ST"), combined by the Company.

1. 2-WireBasic Analog Loop with Analog DID Port

The rate elements related to the unbundled network elements that comprise this ordinarily (new) combined UNE-P, including citations to the currently effective tariffs, are the following:

- Loop Service Order Charge, \$8.86 (see Note 1) NRC per order (Ill. C.C. No. 20, Part 19, Section 2, 2nd Rev. Sheet No. 33);
- b. Line Connection Charge \$25.08 (see Note 2) NRC per Loop (Ill. C.C. No. 20, Part 19, Section 2, 2nd Rev. Sheet No. 33);
- c. 2-Wire Basic Loop: Loop Area A, \$2.59 MRC; Loop Area B, \$7.07 MRC; Loop Area C, \$11.40 MRC (III. C.C. No. 20, Part 19, Section 2, 2nd Rev. Sheet No. 31);
- d. ULS-ST Basic Port Service Order Charge, \$2.93 (see Note 3) NRC per occasion (Ill. C.C. No. 20, Part 19, Section 3, 1st Revised Sheet No. 41);
- e. DID Trunk Port Charge, \$53.01 NRC (III. C.C. No. 20, Part 19, Section 3, 3rd Rev. Sheet No. 40);
- f. ULS-ST DID Trunk Port: \$10.63 MRC plus \$0.01 per telephone number MRC; (Ill. C.C. No. 20, Part 19, Section 3, 3rd Rev. Sheet No. 40);
- g. Daily Usage Feed, \$0.000918 per message (Ill. C.C. No. 20, Part 19, Section 3, Orig. Sheet No. 42);
- h. ULS-ST Service Coordination Fee, \$1.15 MRC per bill per switch (Ill. C.C. No. 20, Part 19, Section 3, Orig. Sheet No. 42);
- i. ULS Billing Establishment Charge (if applicable, \$138.12 per carrier, per switch (Ill. C.C. No. 20, Part 19, Section 3, Orig. Sheet No. 42);
- j. ULS Originating Usage, \$0.000000 per MOU (Ill. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- ULS Terminating Usage, \$0.000000 per MOU (Ill. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- ULS-ST Blended Transport Usage, \$0.001262 per MOU (Ill. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- m. ULS-ST Common Transport Usage, \$0.000809 per MOU (III. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- ULS-ST Tandem Switching Usage, \$0.000215 per MOU (III. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- ULS-ST Reciprocal Compensation, \$0.001100 per MOU (III. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- p. ULS-ST SS7 Signaling Transport, \$0.000176 per message (Ill. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- q. Ameritech Cross-Connection Service, \$0.14 MRC per cross-connect (Ill. C.C. No. 20, Part 23, Section 4, 1st Rev. Sheet No. 46);
- r. Loop Service Coordination Fee, \$1.15 MRC per bill per central office (Ill. C.C. No. 20, Part 19, Section 2, 2nd Revised Sheet No. 33).

- 1. Reduced to \$2.58 pursuant to October 16, 2001 Docket 98-0396 Order
- 2. Reduced to \$20.21 pursuant to October 16, 2001 Docket 98-0396 Order
- 3. Reduced to \$2.35 pursuant to October 16, 2001 Docket 98-0396 Order

2. 2-Wire Basic Analog Loop with Centrex Basic Line Port

The rate elements related to the unbundled network elements that comprise this ordinarily (new) combined UNE-P, including citations to the currently effective tariffs, are the following:

- Loop Service Order Charge, \$8.86 (see Note 1) NRC per order (III. C.C. No. 20, Part 19, Section 2, 2nd Rev. Sheet No. 33);
- b. Line Connection Charge \$25.08 (see Note 2) NRC per Loop (Ill. C.C. No. 20, Part 19, Section 2, 2nd Rev. Sheet No. 33);
- c. 2-Wire Basic Loop: Loop Area A, \$2.59 MRC; Loop Area B, \$7.07 MRC; Loop Area C, \$11.40 MRC (Ill. C.C. No. 20, Part 19, Section 2, 2nd Rev. Sheet No. 31);
- d. ULS-ST Basic Port Service Order Charge, \$2.93 (see Note 3) NRC per occasion (III. C.C. No. 20, Part 19, Section 3, 1st Revised Sheet No. 41);
- e. Centrex Basic Line Port Charge, \$53.01 NRC (III. C.C. No. 20, Part 19, Section 3, 3rd Rev. Sheet No. 40);
- f. ULS-ST Centrex Basic Line Port: \$9.55 MRC; (Ill. C.C. No. 20, Part 19, Section 3, 3rd Rev. Sheet No. 40);
- g. Centrex System Common Block Establishment Charge, \$491.38 NRC; (Ill. C.C. No. 20, Part 19, Section 3, 1st Revised Sheet No. 41);
- h. Centrex System Feature Activation, per feature, \$260.52 NRC; (III. C.C. No. 20, Part 19, Section 3, 1st Revised Sheet No. 41);
- i. Centrex System Features, per Common Block, \$304.33 MRC; (Ill. C.C. No. 20, Part 19, Section 3, 1st Revised Sheet No. 41);
- j. Daily Usage Feed, \$0.000918 per message (Ill. C.C. No. 20, Part 19, Section 3, Orig. Sheet No. 42);
- k. ULS-ST Service Coordination Fee, \$1.15 MRC per bill per switch (Ill. C.C. No. 20, Part 19, Section 3, Orig. Sheet No. 42);
- 1. ULS Billing Establishment Charge (if applicable, \$138.12 per carrier, per switch (Ill. C.C. No. 20, Part 19, Section 3, Orig. Sheet No. 42);
- m. ULS Originating Usage, \$0.000000 per MOU (Ill. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- n. ULS Terminating Usage, \$0.000000 per MOU (Ill. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- o. ULS-ST Blended Transport Usage, \$0.001262 per MOU (III. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- p. ULS-ST Common Transport Usage, \$0.000809 per MOU (III. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- q. ULS-ST Tandem Switching Usage, \$0.000215 per MOU (III. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- r. ULS-ST Reciprocal Compensation, \$0.001100 per MOU (III. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- s. ULS-ST SS7 Signaling Transport, \$0.000176 per message (Ill. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- t. Ameritech Cross-Connection Service, \$0.14 MRC per cross-connect (III. C.C. No. 20, Part 23, Section 4, 1st Rev. Sheet No. 46);
- u. Loop Service Coordination Fee, \$1.15 MRC per bill per central office (Ill. C.C. No. 20, Part 19, Section 2, 2nd Revised Sheet No. 33).

- 1. Reduced to \$2.58 pursuant to October 16, 2001 Docket 98-0396 Order
- 2. Reduced to \$20.21 pursuant to October 16, 2001 Docket 98-0396 Order
- 3. Reduced to \$2.35 pursuant to October 16, 2001 Docket 98-0396 Order

3. 2-Wire P.B.X. Ground Start Analog Loop with Ground Start Port

The rate elements related to the unbundled network elements that comprise this ordinarily (new) combined UNE-P, including citations to the currently effective tariffs, are the following:

- Loop Service Order Charge, \$8.86 (see Note 1) NRC per order (Ill. C.C. No. 20, Part 19, Section 2, 2nd Rev. Sheet No. 33);
- Line Connection Charge \$25.08 (see Note 2) NRC per Loop (III. C.C. No. 20, Part 19, Section 2, 2nd Rev. Sheet No. 33);
- c. 2-Wire P.B.X. Ground Start Analog Loop: Loop Area A, \$2.64 MRC; Loop Area B, \$7.84 MRC; Loop Area C, \$12.38 MRC (III. C.C. No. 20, Part 19, Section 2, 2nd Rev. Sheet No. 31);
- d. ULS-ST Basic Port Service Order Charge, \$2.93 (see Note 3) NRC per occasion (III. C.C. No. 20, Part 19, Section 3, 1st Revised Sheet No. 41);
- e. Ground Start Line Port Charge, \$53.01 NRC (Ill. C.C. No. 20, Part 19, Section 3, 3rd Rev. Sheet No. 40);
- f. ULS-ST Ground Start Line Port: \$5.78 MRC; (Ill. C.C. No. 20, Part 19, Section 3, 3rd Rev. Sheet No. 40);
- g. Daily Usage Feed, \$0.000918 per message (Ill. C.C. No. 20, Part 19, Section 3, Orig. Sheet No. 42);
- h. ULS-ST Service Coordination Fee, \$1.15 MRC per bill per switch (III. C.C. No. 20, Part 19, Section 3, Orig. Sheet No. 42);
- i. ULS Billing Establishment Charge (if applicable, \$138.12 per carrier, per switch (Ill. C.C. No. 20, Part 19, Section 3, Orig. Sheet No. 42);
- j. ULS Originating Usage, \$0.000000 per MOU (III. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- ULS Terminating Usage, \$0.000000 per MOU (Ill. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- ULS-ST Blended Transport Usage, \$0.001262 per MOU (III. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- m. ULS-ST Common Transport Usage, \$0.000809 per MOU (III. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- n. ULS-ST Tandem Switching Usage, \$0.000215 per MOU (Ill. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- o. ULS-ST Reciprocal Compensation, \$0.001100 per MOU (III. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- p. ULS-ST SS7 Signaling Transport, \$0.000176 per message (Ill. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- q. Ameritech Cross-Connection Service, \$0.14 MRC per cross-connect (Ill. C.C. No. 20, Part 23, Section 4, 1st Rev. Sheet No. 46);
- r. Loop Service Coordination Fee, \$1.15 MRC per bill per central office (Ill. C.C. No. 20, Part 19, Section 2, 2nd Revised Sheet No. 33).

- 1. Reduced to \$2.58 pursuant to October 16, 2001 Docket 98-0396 Order
- 2. Reduced to \$20.21 pursuant to October 16, 2001 Docket 98-0396 Order
- 3. Reduced to \$2.35 pursuant to October 16, 2001 Docket 98-0396 Order

4. 2-Wire Electronic Key Line Analog Loop with Centrex EKL Line Port

The rate elements related to the unbundled network elements that comprise this ordinarily (new) combined UNE-P, including citations to the currently effective tariffs, are the following:

- a. Loop Service Order Charge, \$8.86 (see Note 1) NRC per order (III. C.C. No. 20, Part 19, Section 2, 2nd Rev. Sheet No. 33);
- b. Line Connection Charge \$25.08 (see Note 2) NRC per Loop (Ill. C.C. No. 20, Part 19, Section 2, 2nd Rev. Sheet No. 33);
- c. 2-Wire Electronic Key Line Analog Loop: Loop Area A, \$2.95 MRC; Loop Area B, \$12.18 MRC; Loop Area C, \$17.92 MRC (Ill. C.C. No. 20, Part 19, Section 2, 2nd Rev. Sheet No. 31);
- d. ULS-ST Complex Port Service Order Charge, \$410.63 (see Note 3) NRC per occasion (Ill. C.C. No. 20, Part 19, Section 3, 1st Revised Sheet No. 41);
- e. Centrex EKL Line Port Charge, \$53.01 NRC (Ill. C.C. No. 20, Part 19, Section 3, 3rd Rev. Sheet No. 40);
- f. ULS-ST Centrex EKL Line Port: \$27.84 MRC; (III. C.C. No. 20, Part 19, Section 3, 3rd Rev. Sheet No. 40);
- g. Centrex System Common Block Establishment Charge, \$491.38 NRC; (Ill. C.C. No. 20, Part 19, Section 3, 1st Revised Sheet No. 41);
- h. Centrex System Feature Activation, per feature, \$260.52 NRC; (Ill. C.C. No. 20, Part 19, Section 3, 1st Revised Sheet No. 41);
- i. Centrex System Features, per Common Block, \$304.33 MRC; (III. C.C. No. 20, Part 19, Section 3, 1st Revised Sheet No. 41);
- j. Daily Usage Feed, \$0.000918 per message (Ill. C.C. No. 20, Part 19, Section 3, Orig. Sheet No. 42);
- k. ULS-ST Service Coordination Fee, \$1.15 MRC per bill per switch (Ill. C.C. No. 20, Part 19, Section 3, Orig. Sheet No. 42);
- 1. ULS Billing Establishment Charge (if applicable, \$138.12 per carrier, per switch (Ill. C.C. No. 20, Part 19, Section 3, Orig. Sheet No. 42);
- m. ULS Originating Usage, \$0.000000 per MOU (Ill. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- n. ULS Terminating Usage, \$0.000000 per MOU (Ill. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- o. ULS-ST Blended Transport Usage, \$0.001262 per MOU (III. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- p. ULS-ST Common Transport Usage, \$0.000809 per MOU (Ill. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- q. ULS-ST Tandem Switching Usage, \$0.000215 per MOU (III. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- r. ULS-ST Reciprocal Compensation, \$0.001100 per MOU (III. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- s. ULS-ST SS7 Signaling Transport, \$0.000176 per message (Ill. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- t. Ameritech Cross-Connection Service, \$0.14 MRC per cross-connect (Ill. C.C. No. 20, Part 23, Section 4, 1st Rev. Sheet No. 46);
- u. Loop Service Coordination Fee, \$1.15 MRC per bill per central office (Ill. C.C. No. 20, Part 19, Section 2, 2nd Revised Sheet No. 33).

- 1. Reduced to \$2.58 pursuant to October 16, 2001 Docket 98-0396 Order
- 2. Reduced to \$20.21 pursuant to October 16, 2001 Docket 98-0396 Order
- 3. Reduced to \$27.60 pursuant to October 16, 2001 Docket 98-0396 Order

5. 2-Wire 160 Kpbs (ISDN-BRI) Digital Loop with Centrex ISDN Line Port

The rate elements related to the unbundled network elements that comprise this ordinarily (new) combined UNE-P, including citations to the currently effective tariffs, are the following:

- a. Loop Service Order Charge, \$8.86 (see Note 1) NRC per order (Ill. C.C. No. 20, Part 19, Section 2, 2nd Rev. Sheet No. 33);
- b. Line Connection Charge \$25.08 (see Note 2) NRC per Loop (Ill. C.C. No. 20, Part 19, Section 2, 2nd Rev. Sheet No. 33);
- c. 2-Wire 160 kbps (ISDN-BRI) Interface Loop: Loop Area A, \$2.71 MRC; Loop Area B, \$8.88 MRC; Loop Area C, \$13.68 MRC (III. C.C. No. 20, Part 19, Section 2, 2nd Rev. Sheet No. 31);
- d. ULS-ST Complex Port Service Order Charge, \$410.63 (see Note 3) NRC per occasion (III. C.C. No. 20, Part 19, Section 3, 1st Revised Sheet No. 41);
- e. Centrex ISDN Line Port, \$53.01 NRC per port (Ill. C.C. No. 20, Part 19, Section 3, 3rd Rev. Sheet No. 40);
- f. ULS-ST Centrex ISDN Line Port: \$42.07 MRC; (Ill. C.C. No. 20, Part 19, Section 3, 3rd Rev. Sheet No. 40);
- g. Centrex System Common Block Establishment Charge, \$491.38 NRC; (Ill. C.C. No. 20, Part 19, Section 3, 1st Revised Sheet No. 41);
- h. Centrex System Feature Activation, per feature, \$260.52 NRC; (III. C.C. No. 20, Part 19, Section 3, 1st Revised Sheet No. 41);
- Centrex System Features, per Common Block, \$304.33 MRC; (Ill. C.C. No. 20, Part 19, Section 3, 1st Revised Sheet No. 41);
- Daily Usage Feed, \$0.000918 per message (Ill. C.C. No. 20, Part 19, Section 3, Orig. Sheet No. 42);
- ULS-ST Service Coordination Fee, \$1.15 MRC per bill per switch (Ill. C.C. No. 20, Part 19, Section 3, Orig. Sheet No. 42);
- 1. ULS Billing Establishment Charge (if applicable, \$138.12 per carrier, per switch (III. C.C. No. 20, Part 19, Section 3, Orig. Sheet No. 42);
- m. ULS Originating Usage, \$0.000000 per MOU (Ill. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- n. ULS Terminating Usage, \$0.000000 per MOU (III. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- o. ULS-ST Blended Transport Usage, \$0.001262 per MOU (III. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- p. ULS-ST Common Transport Usage, \$0.000809 per MOU (Ill. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- q. ULS-ST Tandem Switching Usage, \$0.000215 per MOU (III. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- r. ULS-ST Reciprocal Compensation, \$0.001100 per MOU (III. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- ULS-ST SS7 Signaling Transport, \$0.000176 per message (Ill. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- Ameritech Cross-Connection Service, \$0.14 MRC per cross-connect (Ill. C.C. No. 20, Part 23, Section 4, 1st Rev. Sheet No. 46);
- Loop Service Coordination Fee, \$1.15 MRC per bill per central office (Ill. C.C. No. 20, Part 19, Section 2, 2nd Revised Sheet No. 33).

- 1. Reduced to \$2.58 pursuant to October 16, 2001 Docket 98-0396 Order
- 2. Reduced to \$20.21 pursuant to October 16, 2001 Docket 98-0396 Order
- 3. Reduced to \$27.60 pursuant to October 16, 2001 Docket 98-0396 Order

6. 4-Wire Digital Loop with ISDN Prime Trunk Port

The rate elements related to the unbundled network elements that comprise this ordinarily (new) combined UNE-P, including citations to the currently effective tariffs, are the following:

- a. Loop Service Order Charge, \$8.86 (see Note 1) NRC per order (III. C.C. No. 20, Part 19, Section 2, 2nd Rev. Sheet No. 33);
- b. Line Connection Charge \$25.08 (see Note 1) NRC per Loop (Ill. C.C. No. 20, Part 19, Section 2, 2nd Rev. Sheet No. 33);
- c. 4-Wire 1.544 Mbps Interface Loop: Loop Area A, \$73.46 MRC; Loop Area B, \$61.45 MRC; Loop Area C, \$61.56 MRC (Ill. C.C. No. 20, Part 19, Section 2, 2nd Rev. Sheet No. 31);
- d. ULS-ST Complex Port Service Order Charge, \$410.63 (see Note 2) NRC per occasion (III. C.C. No. 20, Part 19, Section 3, 1st Revised Sheet No. 41);
- e. ISDN Prime Trunk Port, \$778.06 NRC, per port (Ill. C.C. No. 20, Part 19, Section 3, 3rd Rev. Sheet No. 40);
- f. ULS-ST ISDN Prime Trunk Port: \$155.90 MRC plus \$0.01 per telephone number MRC; (III. C.C. No. 20, Part 19, Section 3, 3rd Rev. Sheet No. 40);
- g. Daily Usage Feed, \$0.000918 per message (Ill. C.C. No. 20, Part 19, Section 3, Orig. Sheet No. 42);
- h. ULS-ST Service Coordination Fee, \$1.15 MRC per bill per switch (Ill. C.C. No. 20, Part 19, Section 3, Orig. Sheet No. 42);
- i. ULS Billing Establishment Charge (if applicable, \$138.12 per carrier, per switch (Ill. C.C. No. 20, Part 19, Section 3, Orig. Sheet No. 42);
- j. ULS Originating Usage, \$0.000000 per MOU (III. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- ULS Terminating Usage, \$0.000000 per MOU (III. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- ULS-ST Blended Transport Usage, \$0.001262 per MOU (Ill. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- m. ULS-ST Common Transport Usage, \$0.000809 per MOU (Ill. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- n. ULS-ST Tandem Switching Usage, \$0.000215 per MOU (III. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- o. ULS-ST Reciprocal Compensation, \$0.001100 per MOU (Ill. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- p. ULS-ST SS7 Signaling Transport, \$0.000176 per message (Ill. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- q. Ameritech Cross-Connection Service, \$0.31 MRC per cross-connect (Ill. C.C. No. 20, Part 23, Section 4, 1st Rev. Sheet No. 46);
- r. Loop Service Coordination Fee, \$1.15 MRC per bill per central office (Ill. C.C. No. 20, Part 19, Section 2, 2nd Revised Sheet No. 33).

Notes:

 Replaced with following rate structure and rates pursuant to October 16, 2001 Docket 98-0396 Order

Administrative Charge	\$142.93
Design & C. O. Line Connection Charge	\$332.61
Customer Connection Charge	\$185.48

2. Reduced to \$27.60 pursuant to October 16, 2001 Docket 98-0396 Order

7. 4-Wire Digital Loop with ULS DS1 Trunk Port

The rate elements related to the unbundled network elements that comprise this ordinarily (new) combined UNE-P, including citations to the currently effective tariffs, are the following:

- a. Loop Service Order Charge, \$8.86 (see Note 1) NRC per order (Ill. C.C. No. 20, Part 19, Section 2, 2nd Rev. Sheet No. 33);
- b. Line Connection Charge \$25.08 (see Note 1) NRC per Loop (Ill. C.C. No. 20, Part 19, Section 2, 2nd Rev. Sheet No. 33):
- c. 4-Wire 1.544 Mbps Interface Loop: Loop Area A, \$73.46 MRC; Loop Area B, \$61.45 MRC; Loop Area C, \$61.56 MRC (Ill. C.C. No. 20, Part 19, Section 2, 2nd Rev. Sheet No. 31);
- d. ULS Trunk Port Service Order Charge, \$410.63 (see Note 3) NRC per occasion (III. C.C. No. 20, Part 19, Section 3, 1st Revised Sheet No. 41);
- e. ULS DS1 Trunk Port, S778.06 NRC, per port (Ill. C.C. No. 20, Part 19, Section 3, 3rd Rev. Sheet No. 40);
- f. ULS DS1 Trunk Port, \$56.78 MRC; (Ill. C.C. No. 20, Part 19, Section 3, 3rd Rev. Sheet No. 40);
- g. Daily Usage Feed, \$0.000918 per message (Ill. C.C. No. 20, Part 19, Section 3, Orig. Sheet No. 42);
- h. ULS-ST Service Coordination Fee, \$1.15 MRC per bill per switch (Ill. C.C. No. 20, Part 19, Section 3, Orig. Sheet No. 42);
- i. ULS Billing Establishment Charge (if applicable, \$138.12 per carrier, per switch (Ill. C.C. No. 20, Part 19, Section 3, Orig. Sheet No. 42);
- j. ULS Originating Usage, \$0.000000 per MOU (Ill. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- k. ULS Terminating Usage, \$0.000000 per MOU (III. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- 1. ULS-ST Blended Transport Usage, \$0.001262 per MOU (Ill. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- m. ULS-ST Common Transport Usage, \$0.000809 per MOU (III. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- n. ULS-ST Tandem Switching Usage, \$0.000215 per MOU (Ill. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- o. ULS-ST Reciprocal Compensation, \$0.001100 per MOU (Ill. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- p. ULS-ST SS7 Signaling Transport, \$0.000176 per message (Ill. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- q. Ameritech Cross-Connection Service, \$0.31 MRC per cross-connect (III. C.C. No. 20, Part 23, Section 4, 1st Rev. Sheet No. 46);
- r. Loop Service Coordination Fee, \$1.15 MRC per bill per central office (Ill. C.C. No. 20, Part 19, Section 2, 2nd Revised Sheet No. 33).

Notes:

 Replaced with following rate structure and rates pursuant to October 16, 2001 Docket 98-0396 Order

DS1

Administrative Charge \$142.93

Design & C. O. Line Connection Charge \$332.61

Customer Connection Charge \$185.48

2. Reduced to \$27.60 pursuant to October 16, 2001 Docket 98-0396 Order

8. 2-Wire Analog COPTS Coin Loop with COPTS-Coin Line Port

The rate elements related to the unbundled network elements that comprise this ordinarily (new) combined UNE-P, including citations to the currently effective tariffs, are the following:

- a. Loop Service Order Charge, \$8.86 (see Note 1) NRC per order (Ill. C.C. No. 20, Part 19, Section 2, 2nd Rev. Sheet No. 33);
- b. Line Connection Charge \$25.08 (see Note 2) NRC per Loop (Ill. C.C. No. 20, Part 19, Section 2, 2nd Rev. Sheet No. 33);
- c. 2-Wire Analog COPTS-Coin Loop: Loop Area A, \$2.67 MRC; Loop Area B, \$8.09 MRC; Loop Area C, \$12.72 MRC (Ill. C.C. No. 20, Part 19, Section 2, 2nd Rev. Sheet No. 31);
- d. ULS-ST Basic Port Service Order Charge, \$2.93 (see Note 3) NRC per occasion (III. C.C. No. 20, Part 19, Section 3, 1st Revised Sheet No. 41);
- e. COPTS-Coin Line Port, \$53.01 NRC, per port (III. C.C. No. 20, Part 19, Section 3, 3rd Rev. Sheet No. 40);
- f. ULS-ST COPTS-Coin Line Port: \$5.78 MRC; (Ill. C.C. No. 20, Part 19, Section 3, 3rd Rev. Sheet No. 40);
- g. Daily Usage Feed, \$0.000918 per message (Ill. C.C. No. 20, Part 19, Section 3, Orig. Sheet No. 42);
- h. ULS-ST Service Coordination Fee, \$1.15 MRC per bill per switch (Ill. C.C. No. 20, Part 19, Section 3, Orig. Sheet No. 42);
- ULS Billing Establishment Charge (if applicable, \$138.12 per carrier, per switch (Ill. C.C. No. 20, Part 19, Section 3, Orig. Sheet No. 42);
- j. ULS Originating Usage, \$0.000000 per MOU (Ill. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- k. ULS Terminating Usage, \$0.000000 per MOU (Ill. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- ULS-ST Blended Transport Usage, \$0.001262 per MOU (III. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- m. ULS-ST Common Transport Usage, \$0.000809 per MOU (Ill. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- n. ULS-ST Tandem Switching Usage, \$0.000215 per MOU (III. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- o. ULS-ST Reciprocal Compensation, \$0.001100 per MOU (III. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- p. ULS-ST SS7 Signaling Transport, \$0.000176 per message (Ill. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- Ameritech Cross-Connection Service, \$0.14 MRC per cross-connect (Ill. C.C. No. 20, Part 23, Section 4, 1st Rev. Sheet No. 46);
- r. Loop Service Coordination Fee, \$1.15 MRC per bill per central office (Ill. C.C. No. 20, Part 19, Section 2, 2nd Revised Sheet No. 33).

- 1. Reduced to \$2.58 pursuant to October 16, 2001 Docket 98-0396 Order
- 2. Reduced to \$20.21 pursuant to October 16, 2001 Docket 98-0396 Order
- 3. Reduced to \$2.35 pursuant to October 16, 2001 Docket 98-0396 Order

9. 2-Wire Analog COPTS Coin Loop with Basic COPTS Line Port

The rate elements related to the unbundled network elements that comprise this ordinarily (new) combined UNE-P, including citations to the currently effective tariffs, are the following:

- a. Loop Service Order Charge, \$8.86 (see Note 1) NRC per order (Ill. C.C. No. 20, Part 19, Section 2, 2nd Rev. Sheet No. 33);
- Line Connection Charge \$25.08 (see Note 2) NRC per Loop (Ill. C.C. No. 20, Part 19, Section 2, 2nd Rev. Sheet No. 33);
- c. 2-Wire Analog COPTS-Coin Loop: Loop Area A, \$2.67 MRC; Loop Area B, \$8.09 MRC; Loop Area C, \$12.72 MRC (Ill. C.C. No. 20, Part 19, Section 2, 2nd Rev. Sheet No. 31);
- d. ULS-ST Basic Port Service Order Charge, \$2.93 (see Note 3) NRC per occasion (III. C.C. No. 20, Part 19, Section 3, 1st Revised Sheet No. 41);
- e. Basic COPTS Line Port, \$53.01 NRC, per port (Ill. C.C. No. 20, Part 19, Section 3, 3rd Rev. Sheet No. 40);
- f. ULS-ST Basic COPTS Line Port: \$5.01 MRC; (III. C.C. No. 20, Part 19, Section 3, 3rd Rev. Sheet No. 40);
- g. Daily Usage Feed, \$0.000918 per message (Ill. C.C. No. 20, Part 19, Section 3, Orig. Sheet No. 42);
- ULS-ST Service Coordination Fee, \$1.15 MRC per bill per switch (Ill. C.C. No. 20, Part 19, Section 3, Orig. Sheet No. 42);
- i. ULS Billing Establishment Charge (if applicable, \$138.12 per carrier, per switch (Ill. C.C. No. 20, Part 19, Section 3, Orig. Sheet No. 42);
- j. ULS Originating Usage, \$0.000000 per MOU (Ill. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- k. ULS Terminating Usage, \$0.000000 per MOU (Ill. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- ULS-ST Blended Transport Usage, \$0.001262 per MOU (Ill. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- m. ULS-ST Common Transport Usage, \$0.000809 per MOU (Ill. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- n. ULS-ST Tandem Switching Usage, \$0.000215 per MOU (Ill. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- o. ULS-ST Reciprocal Compensation, \$0.001100 per MOU (III. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- p. ULS-ST SS7 Signaling Transport, \$0.000176 per message (Ill. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- q. Ameritech Cross-Connection Service, \$0.14 MRC per cross-connect (III. C.C. No. 20, Part 23, Section 4, 1st Rev. Sheet No. 46);
- r. Loop Service Coordination Fee, \$1.15 MRC per bill per central office (Ill. C.C. No. 20, Part 19, Section 2, 2nd Revised Sheet No. 33).

- 1. Reduced to \$2.58 pursuant to October 16, 2001 Docket 98-0396 Order
- 2. Reduced to \$20.21 pursuant to October 16, 2001 Docket 98-0396 Order
- 3. Reduced to \$2.35 pursuant to October 16, 2001 Docket 98-0396 Order

Enhanced Extended Loop (EEL)

Situation

CLEC requests the Company to perform the work to combine the following unbundled Loop and unbundled Dedicated Transport (Interoffice Facility) combination, known as Enhanced Extended Loop or EEL (Based on currently effective tariff). Loop NRCs reflected below revised pursuant to October 16, 2001 Docket 98-0396 Order shown on page 21 following.

1. 2-Wire Analog Loop to DS1 Dedicated Transport

Pricing Example

Assumptions

- ➤ Unbundled 2-Wire Analog Basic Loop in Area A, B or C
- ➤ Unbundled Dedicated Transport (DS1) in Zone 1, 2 or 3
- > 5 Miles of Interoffice Mileage
- ➤ Voice/Base Rate to DS1 Multiplexing Required

Recurring Area:	<u>A</u>	<u>B</u>	<u>C</u>
➤ Unbundled 2-Wire Analog Basic Loop*/ 1/	\$2.59	\$7.07	\$11.40
Service Coordination Fee /2/			
per carrier bill, per central office	\$1.15	\$1.15	\$1.15
➤ Unbundled DS1 Transport /3/ Zone:	<u>1</u>	<u>2</u>	<u>3</u>
Entrance Facility per point of Termination	\$73.46	\$61.45	\$61.56
Interoffice Mileage Termination			
Per point of Termination, (2) @ 17.35	\$34.70	\$34.70	\$34.70
➤ Interoffice Mileage (5) @ 1.88	\$ 9.40	\$ 9.40	\$ 9.40
Central Office Multiplexing /4/	\$275.34	\$275.34	\$275.34
> Cross-Connect (1) /5/	\$.43	\$.43	\$.43
Total:	\$397.07	\$389.54	\$393.98

^{*} This example illustrates one loop. One cross-connect per loop applies (\$0.14 MRC).

Non-Recurring

Tr	ans	po	ort	/	6/

≻	Administration Charge, per order	\$406.61
	Design and Central Office Connection Charge, per circuit	\$632.71
➤	Carrier Connection Charge, per termination	\$585.51
Lo	ops /2/	
\triangleright	Service Order Charge, per order	\$ 8.86
\triangleright	Line Connection Charge, per termination	\$ 25.08

- 1 Ill. C.C. No. 20, Part 19, Section 2, 2nd Revised Sheet No. 31
- 2 Ill. C.C. No. 20, Part 19, Section 2, 2nd Revised Sheet No. 33
- 3 Ill. C.C. No. 20, Part 19, Section 12, Original Sheet No. 30
- 4 Ill. C.C. No. 20, Part 19, Section 12, Original Sheet No. 31
- 5 Ill. C.C. No. 20, Part 23, Section 4, 1st Revised Sheet No. 46
- 6 Ill. C.C. No. 20, Part 19, Section 12, Original Sheet No. 40

2. 2-Wire Analog Loop to DS3 Dedicated Transport

Pricing Example

Assumptions

- ➤ Unbundled 2-Wire Analog Basic Loop in Area A, B or C
- ➤ Unbundled Dedicated Transport (DS3) in Zone 1, 2 or 3
- > 5 Miles of Interoffice Mileage
- ➤ Voice/Base Rate to DS3 Multiplexing Required

Recurring Area:	<u>A</u>	<u>B</u>	<u>C</u>
Unbundled 2-Wire Analog Basic Loop*/1/	\$2.59	\$7.07	\$11.40
Service Coordination Fee /2/			
per carrier bill, per central office	\$1.15	\$1.15	\$1.15
➤ Unbundled DS3 Transport /3/ Zone:	<u>1</u>	<u>2</u>	<u>3</u>
Entrance Facility per point of Termination	\$686.47	<i>\$768.77</i>	\$752.87
 Interoffice Mileage Termination 			
Per point of Termination, (2) @ 146.93	\$293.86	\$293.86	\$293.86
➤ Interoffice Mileage (5) @ 29.81	\$149.05	\$149.05	\$149.05
Central Office Multiplexing			
Voice/Base Rate to DS1 /4/	\$275.34	\$275.34	\$275.34
DS1 to DS3 /5/	\$404.30	\$404.30	\$404.30
> Cross-Connect (1) /6/	\$.76	\$.76	\$.76
Total:	\$1813.52	\$1900.30	\$1888.73

^{*} This example illustrates one loop. One cross-connect per loop applies (\$0.14 MRC) and one cross-connect per DS1 (\$0.43 MRC).

Non-Recurring

Transport /7/

	1 ' '		
	Administration Charge, per order	\$308.22	
	Design and Central Office Connection Charge, per circuit	\$671.16	
\triangleright	Carrier Connection Charge, per termination	\$377.25	
Lo	oops /2/		
	Service Order Charge, per order	\$ 8.86	
\triangleright	Line Connection Charge, per termination	\$ 25.08	

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1	111.	C.C. 110.	. 20. I ai i	1/	OCCHOILE.	_ · · · I\C \	13CU DICC	C 1 1 O . O .

² Ill. C.C. No. 20, Part 19, Section 2, 2nd Revised Sheet No. 33

³ Ill. C.C. No. 20, Part 19, Section 12, Original Sheet No. 32

⁴ Ill. C.C. No. 20, Part 19, Section 12, Original Sheet No. 31

⁵ Ill. C.C. No. 20, Part 19, Section 12, Original Sheet No. 33

⁶ Ill. C.C. No. 20, Part 23, Section 4, 1st Revised Sheet No. 46

⁷ Ill. C.C. No. 20, Part 19, Section 12, Original Sheet No. 40

3. 4-Wire Analog Loop to DS1 Dedicated Transport

Pricing Example

Assumptions

- ➤ Unbundled 4-Wire Analog Loop in Area A, B or C
- ➤ Unbundled Dedicated Transport (DS1) in Zone 1, 2 or 3
- > 5 Miles of Interoffice Mileage
- ➤ Voice/Base Rate to DS1 Multiplexing Required

Recurring A	rea: <u>A</u>	<u>B</u>	<u>C</u>
➤ Unbundled 4-Wire Analog Loop* /1/	\$4.08	\$16.82	\$26.63
Service Coordination Fee /2/			
per carrier bill, per central office	\$1.15	\$1.15	\$1.15
Unbundled DS1 Transport /3/ Z	one: <u>1</u>	<u>2</u>	<u>3</u>
 Entrance Facility per point of Terminat 	ion \$73. 4 6	\$61.45	\$61.56
Interoffice Mileage Termination			
Per point of Termination, (2) @	1 <mark>7.35 \$34.7</mark> 0	\$34.70	\$34.70
➤ Interoffice Mileage (5) @ 1.88	\$ 9.40	\$ 9.40	\$ 9.40
➤ Central Office Multiplexing /4/	\$275.34	\$275.34	\$275.34
> Cross-Connect (1) /5/	<u>\$.43</u>	\$.43	\$.43
Total:	\$389.56	\$399.29	\$409.21

^{*} This example illustrates one loop. One cross-connect per loop applies (\$0.31 MRC).

Non-Recurring

Tra	insport /6/
	Administrati

	Administration Charge, per order	\$406.61
\triangleright	Design and Central Office Connection Charge, per circuit	\$632.71
	Carrier Connection Charge, per termination	\$585.51
Lo	ops /2/	
	Service Order Charge, per order	\$ 8.86
\triangleright	Line Connection Charge, per termination	\$ 25.08

1	III. C.C. No. 20, Part	19, Section 2, 2 nd Revised Sheet No. 31
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² III. C.C. No. 20, Part 19, Section 2, 2nd Revised Sheet No. 33

³ Ill. C.C. No. 20, Part 19, Section 12, Original Sheet No. 30

Ill. C.C. No. 20, Part 19, Section 12, Original Sheet No. 31 4

III. C.C. No. 20, Part 23, Section 4, 1st Revised Sheet No. 46 5

⁶ III. C.C. No. 20, Part 19, Section 12, Original Sheet No. 40

4. 4-Wire Analog Loop to DS3 Dedicated Transport

Pricing Example

Assumptions

- ➤ Unbundled 4-Wire Analog Loop in Area A, B or C
- ➤ Unbundled Dedicated Transport (DS3) in Zone 1, 2 or 3
- > 5 Miles of Interoffice Mileage
- ➤ Voice/Base Rate to DS3 Multiplexing Required

Recurring Area:	<u>A</u>	<u>B</u>	<u>C</u>
➤ Unbundled 4-Wire Analog Loop* /1/	\$4.08	\$16.82	\$26.63
➤ Service Coordination Fee /2/			
per carrier bill, per central office	\$1.15	\$1.15	\$1.15
➤ Unbundled DS3 Transport /3/ Zone	: <u>1</u>	<u>2</u>	<u>3</u>
Entrance Facility per point of Termination	\$686.47	\$768.77	\$752.87
 Interoffice Mileage Termination 			
Per point of Termination, (2) @ 146.93	\$293.86	\$293.86	\$293.86
> Interoffice Mileage (5) @ 29.81	\$149.05	\$149.05	\$149.05
 Central Office Multiplexing 			
Voice/Base Rate to DS1 /4/	\$275.34	\$275.34	\$275.34
DS1 to DS3 /5/	\$404.30	\$404.30	\$404.30
> Cross-Connect (1) /6/	\$76	\$.76	\$.76
Total:	\$1815.01	\$1910.05	\$1903.96

^{*} This example illustrates one loop. One cross-connect per loop applies (\$0.31 MRC) and one cross-connect per DS1 (\$0.43 MRC).

Non-Recurring

T	ransport	/	7/

	Administration Charge, per order	\$308.22	
	Design and Central Office Connection Charge, per circuit	\$671.16	
\triangleright	Carrier Connection Charge, per termination	\$377.25	
Lo	ops /2/		
	Service Order Charge, per order	\$ 8.86	
\triangleright	Line Connection Charge, per termination	\$ 25.08	

- 1 Ill. C.C. No. 20, Part 19, Section 2, 2nd Revised Sheet No. 31
- 2 Ill. C.C. No. 20, Part 19, Section 2, 2nd Revised Sheet No. 33
- 3 Ill. C.C. No. 20, Part 19, Section 12, Original Sheet No. 32
- 4 Ill. C.C. No. 20, Part 19, Section 12, Original Sheet No. 31
- 5 Ill. C.C. No. 20, Part 19, Section 12, Original Sheet No. 33
- 6 Ill. C.C. No. 20, Part 23, Section 4, 1st Revised Sheet No. 46
- 7 Ill. C.C. No. 20, Part 19, Section 12, Original Sheet No. 40

5. 2-Wire Digital Loop to DS1 Dedicated Transport

Pricing Example

Assumptions

- ➤ Unbundled 2-Wire Digital Loop in Area A, B or C
- ➤ Unbundled Dedicated Transport (DS1) in Zone 1, 2 or 3
- ➤ 5 Miles of Interoffice Mileage
- ➤ Voice/Base Rate to DS1 Multiplexing Required

<u>Recurring</u> Area	ı: A	В	C
➤ Unbundled 2-Wire Digital Loop* /1/	\$2.71	\$8.88	\$13.68
➤ Service Coordination Fee/2/			
per carrier bill, per central office	\$1.15	\$1.15	\$1.15
➤ Unbundled DS1 Transport /3/ Zone	e: <u>1</u>	<u>2</u>	<u>3</u>
Entrance Facility per point of Termination	r \$73.46	\$61.45	\$61.56
Interoffice Mileage Termination			
Per point of Termination, (2) @ 17.	35 \$34.70	\$34.70	\$34.70
➤ Interoffice Mileage (5) @ 1.88	\$ 9.40	\$ 9.40	\$ 9.40
➤ Central Office Multiplexing /4/	\$275.34	\$275.34	\$275.34
> Cross-Connect (1) /5/	<u>\$.43</u>	\$.43	\$.43
Total:	\$397.19	\$391.35	\$396.26

^{*} This example illustrates one loop. One cross-connect per loop applies (\$0.14 MRC).

Non-Recurring

Tr	ansport /6/		
\triangleright	Administration Charge, per order	\$406.61	
	Design and Central Office Connection Charge, per circuit	\$632.71	
\triangleright	Carrier Connection Charge, per termination	\$585.51	
Lo	ops /2/		
\triangleright	Service Order Charge, per order	\$ 8.86	
	Line Connection Charge, per termination	\$ 25.08	

- 1 Ill. C.C. No. 20, Part 19, Section 2, 2nd Revised Sheet No. 31
- 2 Ill. C.C. No. 20, Part 19, Section 2, 2nd Revised Sheet No. 33
- 3 Ill. C.C. No. 20, Part 19, Section 12, Original Sheet No. 30
- 4 Ill. C.C. No. 20, Part 19, Section 12, Original Sheet No. 31
- 5 Ill. C.C. No. 20, Part 23, Section 4, 1st Revised Sheet No. 46
- 6 Ill. C.C. No. 20, Part 19, Section 12, Original Sheet No. 40

6. 2-Wire Digital Loop to DS3 Dedicated Transport

Pricing Example

Assumptions

- Unbundled 2-Wire Digital Loop in Area A, B or C
- ➤ Unbundled Dedicated Transport (DS3) in Zone 1, 2 or 3
- > 5 Miles of Interoffice Mileage
- ➤ Voice/Base Rate to DS3Multiplexing Required

Recurring Area	: <u>A</u>	<u>B</u>	<u>C</u>
➤ Unbundled 2-Wire Digital Loop* /1/	\$2.71	\$8.88	\$13.68
➤ Service Coordination Fee /2/			
per carrier bill, per central office	\$1.15	\$1.15	\$1.15
➤ Unbundled DS3 Transport /3/ Zone	: <u>1</u>	<u>2</u>	<u>3</u>
Entrance Facility per point of Termination	\$686.47	\$768. 77	\$7 52.87
 Interoffice Mileage Termination 			
Per point of Termination, (2) @ 146.93	\$293.86	\$293.86	\$293.86
> Interoffice Mileage (5) @ 29.81	\$149.05	\$149.05	\$149.05
Central Office Multiplexing			
Voice/Base Rate to DS1 /4/	\$275.34	\$275.34	\$275.34
DS1 to DS3 /5/	\$404.30	\$404.30	\$404.30
> Cross-Connect (1) /6/	\$76_	\$.76	\$.76
Total:	\$1813.64	\$1902.11	\$1891.01

^{*} This example illustrates one loop. One cross-connect per loop applies (\$0.14 MRC) and one cross-connect per DS1 (\$0.43 MRC).

Non-Recurring

Transport /7/	
> Administration Charge, per order	\$308.22
Design and Central Office Connection Charge, per circuit	\$671.16
> Carrier Connection Charge, per termination	\$377.25
Loops /2/	
Service Order Charge, per order	\$ 8.86
➤ Line Connection Charge, per termination	\$ 25.08

1	Ill. C.C. No. 20, Part	19, Section 2, 2nd 1	Revised Sheet No. 31
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- 2 Ill. C.C. No. 20, Part 19, Section 2, 2nd Revised Sheet No. 33
- 3 Ill. C.C. No. 20, Part 19, Section 12, Original Sheet No. 32
- 4 Ill. C.C. No. 20, Part 19, Section 12, Original Sheet No. 31
- 5 Ill. C.C. No. 20, Part 19, Section 12, Original Sheet No. 33
- 6 Ill. C.C. No. 20, Part 23, Section 4, 1st Revised Sheet No. 46
- 7 Ill. C.C. No. 20, Part 19, Section 12, Original Sheet No. 40

7. 4-Wire Digital Loop to DS1 Dedicated Transport

Pricing Example

Assumptions

- ➤ Unbundled 4-Wire Digital Loop in Area A, B or C
- ➤ Unbundled Dedicated Transport (DS1) in Zone 1, 2 or 3
- > 5 Miles of Interoffice Mileage
- ➤ No Multiplexing Required

Recurring		Area:	<u>A</u>	<u>B</u>	<u>C</u>
Unbundled 4-Wire D	igital Loop /1/		\$73.46	\$61.45	\$61.56
Service Coordination	Fee /2/				
per carrier bill, p	er central office		\$1.15	\$1.15	\$ 1. 1 5
Unbundled DS1 Trail	sport/3/	Zone:	<u>1</u>	<u>2</u>	<u>3</u>
Entrance Facility	per point of Terr	nination	\$73.46	\$61.45	\$61.56
Interoffice Mileag	ge Termination				
	of Termination, ((2) @ 17.35	\$34.70	\$34.70	\$34.70
Interoffice Mileas	ge (5) @ 1.88		\$ 9.40	\$ 9.40	\$ 9.40
➤ Cross-Connect (1) /4	/		\$.43	\$.43	\$.43
	Total:		\$192.60	\$168.58	\$168.80

^{*} This example illustrates one loop. One cross-connect per loop applies (\$0.31 MRC).

Non-Recurring

Tra	ansport /5/	
×	Administration Charge, per order	\$406.61
	Design and Central Office Connection Charge, per circuit	\$632.71
\triangleright	Carrier Connection Charge, per termination	\$585.51
Lo	ops /2/	
\triangleright	Service Order Charge, per order	\$ 8.86
\triangleright	Line Connection Charge, per termination	\$ 25.08

- 1 Ill. C.C. No. 20, Part 19, Section 2, 2nd Revised Sheet No. 31
- 2 Ill. C.C. No. 20, Part 19, Section 2, 2nd Revised Sheet No. 33
- 3 Ill. C.C. No. 20, Part 19, Section 12, Original Sheet No. 30
- 4 Ill. C.C. No. 20, Part 23, Section 4, 1st Revised Sheet No. 46
- 5 Ill. C.C. No. 20, Part 19, Section 12, Original Sheet No. 40

8. 4-Wire Digital Loop (DS1) to DS3 Dedicated Transport

Pricing Example

Assumptions

- ➤ Unbundled 4-Wire Digital Loop (DS1) in Area A, B or C
- ➤ Unbundled Dedicated Transport (DS3) in Zone 1, 2 or 3
- > 5 Miles of Interoffice Mileage
- > DS1 to DS3 Multiplexing Required

Recurring	Area:	<u>A</u>	<u>B</u>	<u>C</u>
Unbundled 4-Wire Digital Loop* /1/		\$73.46	\$61.45	\$61.56
Service Coordination Fee /2/				
per carrier bill, per central office		\$1.15	\$1.1 5	\$1.15
Unbundled DS3 Transport /3/	Zone:	<u>1</u>	<u>2</u>	<u>3</u>
Entrance Facility per point of Termi	ination	\$686.47	\$768.77	\$752.87
Interoffice Mileage Termination				
per point of Termination (2) @ 14	6.93	\$293.86	\$293.86	\$293.86
➤ Interoffice Mileage (5) @ 29.81		\$149.05	\$149.05	\$149.05
Central Office Multiplexing DS1 to DS3	3 /4/	\$404.30	\$404.30	\$404.30
> Cross-Connect (1) /5/		<u>\$.76</u>	\$.76	\$.76
Total:		\$1609.05	\$1679.34	\$1663.55

^{*} This example illustrates one loop. One cross-connect per loop applies (\$0.31 MRC) and one cross-connect per DS1 (\$0.43 MRC).

Non-Recurring

Tra	ansport /6/	
\triangleright	Administration Charge, per order	\$308.22
\triangleright	Design and Central Office Connection Charge, per circuit	\$671.16
	Carrier Connection Charge, per termination	\$377.25
Lo	ops /2/	
	Service Order Charge, per order	\$ 8.86
\triangleright	Line Connection Charge, per termination	\$ 25.08

- 1 Ill. C.C. No. 20, Part 19, Section 2, 2nd Revised Sheet No. 31
- 2 Ill. C.C. No. 20, Part 19, Section 2, 2nd Revised Sheet No. 33
- 3 Ill. C.C. No. 20, Part 19, Section 12, Original Sheet No. 32
- 4 Ill. C.C. No. 20, Part 19, Section 12, Original Sheet No. 33
- 5 Ill. C.C. No. 20, Part 23, Section 4, 1st Revised Sheet No. 46
- 6 Ill. C.C. No. 20, Part 19, Section 12, Original Sheet No. 40

Unbundled Loop Service Charges Pursuant to ICC Order in Docket 98-0396

Analog Loops:	Current	Rev	<u>rised</u>
Service Order, per order	\$8.86	\$2.5	58
Line Connection, per termination	\$25.08	\$20	.21
Digital Loops:		DS0	<u>DS1</u>
Service Order, per order	\$8.86		
Line Connection, per termination	\$25.08		
Administrative, per order		\$91.88	\$142.93
Design & C.O. Line Connection, per cir	rcuit	\$127.86	\$332.61
Customer Connection		\$121.94	\$185.48